

ETEXT ATTACHMENT

02/23/2005 10 : 13

[BeginText]

Ms. Abbie Hodgson, Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission

Dear Ms. Hodgson,

On behalf of the International Longshoremen s Association Committee on Political Education (ILA COPE), we hereby file this Form 99 Miscellaneous report in response to your letters seeking additional information regarding the 2003 Amended Mid Year Report and the 2004 30-Day Post General Report.

With respect to the Mid Year Report: The \$367,156.30 in unitemized receipts are individual contributions aggregating less than \$200 in a calendar year from each individual. As we have discussed in the past, the NGP software does not allow us to place unitemized receipts in the report and they then have to be reported on Line 11(a)(i). It was simply an oversight that the memo section did not contain the usual "individual contributions aggregating less than \$200" memo text explaining the nature of the funds. We are amending our report to reflect this. Similarly, the Line 17 receipts should also contain a notation that the funds are dividends and municipal income, and we are amending the reports accordingly. With respect to the apparently excessive contributions and the lack of election or office sought designation, these were not excessive contributions but were merely reported as having been made for the incorrect election, or were inadvertently not noted at all. This was an error/oversight, and we are amending our report accordingly. With respect to the 30 Day Post General Report, as with our response to your inquiry on January 11, 2005, these were for T-Shirts and a mailing provided to ILA members only, and did not constitute, as such, public communications or independent expenditures. We also did not feel it appropriate to file a Form 7 because those reports are used only by corporations and labor organizations. As you stated during a subsequent phone conversation, your supervisor approved reporting in this fashion as appropriate under the circumstances and that our January 11, 2005 response was, thus, adequate. The same rule should apply here as these are identical circumstances. We will, however, clarify on the report that these were T-Shirts and a mailing provided to members only. Please do not hesitate to contact me if you have any questions at (203) 254-3233.

Sincerely, Corey Rubin

[EndText]